



April 18, 2003

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APR 22 2003

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Opposition to RM No. 10687

Dear Ms. Dortch:

The National Railroad Passenger Corporation ("Amtrak") is opposed to the petition of the Industrial Telecommunications Association ("ITA") to be a frequency coordinator for railroad mobile radio frequencies.

Amtrak trains serve more than 500 passenger stations in 46 states, operating over more than 22,000 route miles of track. Amtrak itself owns 730 route miles (about three percent of the total nationwide), primarily between Boston and Washington, D.C., and in Michigan. In other parts of the country, Amtrak trains use tracks owned by freight railroads.

Amtrak relies heavily on mobile radio communications systems to operate its passenger rail network. Whether operating on its own tracks or those owned by freight railroads, each Amtrak locomotive crew is required to be in voice contact with the dispatcher who is controlling the territory where the train is traveling. This means that the mobile radios in Amtrak locomotives must be interoperable and compatible with the mobile communications networks of all railroads nationwide.

The requirement for nationwide interoperability of railroad mobile radio systems places a very high premium on careful, consensus-based network planning among all railroads, and highlights the importance of precise frequency coordination so as to avoid coverage gaps and interference. To date, the Association of American Railroads ("AAR"), of which Amtrak is a member, has been the industry's exclusive frequency coordinator. This arrangement has

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served the railroads very well in the past, and Amtrak believes it would be unwise for the FCC to change the present system by certifying multiple entities to be coordinators of railroad frequencies, as requested by ITA.

The fact that AAR is an entity that is owned and controlled by railroads ensures that persons who are knowledgeable about rail operations perform the frequency coordination function. This is very important given the complexity and specialized nature of the rail industry's mobile radio networks

Amtrak agrees with the arguments set forth in the "Opposition of the Association of American Railroads" in this proceeding, and joins with AAR in urging the FCC to deny ITA's petition.

Sincerely,  
  
David P. Flinkstrom

Sr. Technical Director Design &  
Standards - Communications

cc: Mr. Jeremy Denton  
Industrial Telecommunications Assoc.  
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